



Glavin PLLC  
156 W. 56<sup>th</sup> Street, Suite 2004  
New York, NY 10019

glavinpllc.com  
646.693.5505

August 6, 2024

**By ECF**

Honorable Taryn A. Merkl  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

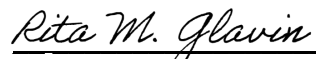
**Re: *Trooper v. NYSP et al.*, 22-cv-893 (LDH)(TAM)**

Dear Judge Merkl:

I represent former Governor Andrew M. Cuomo in the above-referenced action and write to request: (1) an extension of the time to file Governor Cuomo's Answer given Trooper 1's pre-motion letter and motion for reconsideration or permission to file a third amended complaint, ECF 261 (Trooper 1's Motion for Reconsideration or Leave to Amend), 262 (Trooper 1's pre-motion letter); and (2) an extension of the deadline for party discovery to October 18, 2024. Counsel for all parties have agreed to these extensions.

With respect to the first request, the parties have agreed to an extension of time for the Answer to two weeks after Judge DeArcy Hall rules on Trooper 1's pending motion. Given the potential for an amended complaint, this extension will eliminate having to re-duplicate efforts in filing an Answer. As for the second request, the extension of the party discovery deadline to October 18, 2024, will allow time for the depositions of Trooper 1 and Governor Cuomo at agreed-upon dates prior to October 18, 2024.

Respectfully submitted,

  
Rita M. Glavin

Cc: All Parties of Record